

3

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

P J Cotter,

Plaintiff.

Case No. 12-cv-15382

v.

Honorable Nancy G. Edmunds

GMAC MORTGAGE, LLC.

Magistrate Judge Laurie J. Michelson

Defendant.

2013 JUL - A 11:13

U.S. DIST. COURT CLERK
EAST. DIST. MICHIGAN
DETROIT

P J Cotter
6243 Church Road
Fair Haven, MI 48023
(810) 689-231

Thomas M. Schehr (P54391)
Nasseem S. Ramin (P73513)
Attorneys for Defendant
DYKEMA GOSSETT PLLC
400 Renaissance Center, 37th Floor
Detroit, MI 48243
(313) 568-5326

**PLAINTIFFS OBJECTION: TO THE REPORT AND RECOMMENDATION TO
GRANT DEFENDANT'S MOTION TO DISMISS**

Now comes P J Cotter, Plaintiff, and hereby gives notice to the Court that the Plaintiff objects to Judge Laurie J. Michelson rendering a REPORT AND RECOMMENDATION TO GRANT DEFENDANT'S MOTION TO DISMISS.

The Defendants tortious actions recorded in the documents filed into this Honorable court, has caused Plaintiff irreparable damage that is ongoing and

continuing. The record reflects that no admissible evidence has been placed upon the record of this Court, by Defendants that proves otherwise.

The Defendants have commenced a Frivolous Foreclosure by advertisement action without their having standing, or capacity, to file such an action, at the time of the filing. Defendants have committed a tort that exists in its own right, independent of any legal contract. The record reflects that no admissible evidence exists on the record in this instant action that proves otherwise.

The court knew or should have known that the Honorable Nancy G. Edmunds is in conflict of interest, due to her previous employment at the Defendants Law Firm, DYKEMA GOSSETT PLLC.

WHEREFORE, for good cause, shown, the facts, and admissible evidence in the record, Plaintiff moves the Honorable Court to grant the objection as shown above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my knowledge.

Executed this 1st day of July 2013, at Saint Clair County, Michigan.


PJ Cotter

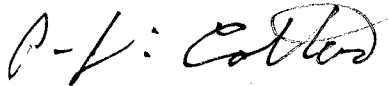
CERTIFICATE OF SERVICE

I P J Cotter certify that on this 1st day of July, 2013 a copy of the foregoing documents filed in the U.S. District Court In The Eastern District of Michigan Southern Division, were served upon the following parties via U.S.P.S. first class mail

Thomas M. Schehr (P54391)
Nasseem S. Ramen (P73513)
Attorneys for Defendant
Dykema Gossett PLLC
400 Renaissance Center, 37th floor
Detroit, MI 48243
313.568.5326

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1st day of July, 2013, at Saint Clair County, Michigan.

A handwritten signature in black ink, appearing to read "P-J: Cotter", written in a cursive style.

PJ Cotter